

EXHIBIT 106

**DECLARATION UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746
AND/OR
SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW**

1. My name is Angel Poventud. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Fulton County in Georgia and my residence address is [REDACTED]
[REDACTED], Atlanta, Georgia 30310.
3. I have reviewed the list below and I believe that my situation most closely fits into the category that I have checked:
 - a. _____ I requested an absentee ballot but I never received it.
 - b. _____ I received an absentee ballot and returned it but my ballot was rejected.
 - c. _____ I received an absentee ballot and returned it but my ballot was not accepted.
 - d. _____ I was not permitted to vote using a voting machine (a DRE) (circumstances below) and was not offered a provisional ballot even though I reside in the county in which the precinct was located where I tried to vote.
 - e. _____ I was not permitted to vote using a voting machine (a DRE) (circumstances below) because I was told I was not a resident of the

county in which I was attempting to vote despite the fact that I had changed my address in a timely manner.

- f. ____ I was not permitted to vote using a voting machine (a DRE) (circumstances below). I asked for a provisional ballot but was told that it was too early in the day for provisional ballots or that there were not enough provisional ballots or that no provisional ballots remained.
- g. ____ I moved counties but did not change my registration address. When I attempted to vote in my new county, the poll workers told me to return to my old county in order to vote.
- h. X There were long lines at my polling location and I saw people leaving without voting.
- i. ____ There were long lines at my polling location and I had to leave without being able to cast my vote.
- j. ____ There were problems with the voting machines at the precinct at which I voted or attempted to vote.
- k. X Other – please explain – I was a concerned citizen observer at the Pitman Recreational Center and witnessed a number of deficiencies that impacted the number of persons who were able to vote on election day. Please see below.

4. My individual circumstances are the following: I was a concerned citizen observer at the Pitman Recreational Center for the recent November 6, 2018, elections. I observed voting for 13 hours that day, from 8:30 a.m. to 9:30 p.m. The Pitman polling center was a combined polling place, intended to handle registered voters for both Gideons Elementary School and Pitman. Gideons is under renovation so those voters were directed to Pitman. At the start of the voting day, there were only three voting machines that were operable. Given the anticipated voter volume, there should have been 10-12 voting machines. At approximately 11:30 a.m., five additional machines were brought to Pitman. However, none of the additional five machines came with any additional staff to assist or with the proper equipment to make them fully operable. Thus, throughout the day, there were primarily three machines that were available for use, while the other five were not being used to capacity. The voting wait times were extraordinarily long throughout the day because there was insufficient staff to assist voters and an inadequate number of operable voting machine to handle the volume of the combined polling places. Wait times ranged from an average of 2-4 hours throughout the day. I observed dozens of people leave the line in frustration. To compound matters, the Pitman polling location closed at 7:00 p.m. – and remain closed for another 30 minutes – even though a court order

had been entered, requiring the polling station to remain open from 7:00 p.m. through 9:00 p.m. The delay in re-opening the polling station caused many voters to turn away. For the day, approximately 900 voters cast their ballots, a fraction of the registered voters in Gideons and Pitman. I believe several hundreds of voters were not able to cast their votes because of the problems at Pitman. I took contemporaneous notes of the issues we experienced at Pitmen on November 6, 2018. Those notes are attached.

5. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.
6. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
7. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 11th day of November, 2018.


Angel Poventud

Sworn to and subscribed before me
This the 11th day of November, 2018.


Notary Public



1) HADN'T DONE MY PART, NO DONATIONS OR CANVASSING

2) P/U AN UMBRELLA FOR THE COMING RAIN, SHOWED UP AT 8¹⁵.

3) MY FRIEND LUCK CAME OUT AT 8³⁰ (POSTED TO FACEBOOK @ 835 THAT WE WERE STARTING MACHINES) LETTING ME KNOW THAT SHE HAD SHOWED UP AT 845AM AND THAT IT ^{ALMOST} ~~TOOK~~ 2 HRS FOR HER TO VOTE

4) 836 I STARTED MAKING PHONE ~~CALLS~~ ^{CALLS} 13 PHONE CALLS TO VOTER PROTECTION #S AND REPORTERS LOCALLY AND ACROSS THE NATION, I MADE PHONE CALLS FROM 836, TO 1051.

5) 1125 AM, 5 MORE VOTING MACHINES SHOWED UP

6) JESSIE JACKSON HAD SHOWED UP JUST A BIT EARLIER ^(1020AM) ENCOURAGING PEOPLE TO STAY AND VOTE AND MAKING A TON OF PHONE CALLS HIMSELF

7) THE ADRIAN PARK NEIGHBOR HOOD STARTED TO RAISE # ON LINE THROUGH FACE BOOK. FOR PIZZA. SOMEONE HAD SHARED THE WEBSITE PIZZA TO THE POLLS ON MY PAGE AND I TRIED TO USE IT BUT I WASN'T HAVING MUCH LUCK.

8) ^{(1038)AM} SOMEONE HAD BROUGHT 10 BOXES OF DONUTS AND COFFEE FOR THE LINE. THAT STUFF WAS TAKING INSIDE BUT UP TO THE POINT I WAS STAYING OUT SIDE.

9) PROBABLY ABOUT NOON PIZZA STARTED TO SHOW UP. JUST 8 BOXES AT FIRST. THERE WAS A REAL CONCERN THAT THERE WOULDN'T BE ENOUGH FOR EVERYONE BUT WE FIGURED WE HAD TO GO IN AND START HANDING IT OUT.

10) MORE PIZZAS STARTED SHOWING UP.

11) I STARTED HEARING STORIES ABOUT HOW ^{LONG} ~~LONG~~ ^{LONG} VOTING WAS TAKING FROM NEIGHBORS. 2346 4-00-20

THE NEXT WEISPEL THEY WENT WITHIN THEY GOT INTO THE LINE. 2 HOURS LATER THERE WERE ONLY 2 PEOPLE BETWEEN THEM WITHIN THEY VOTED. 11 PEOPLE HAD LEFT THE LINE IN JUST THAT SMALL SECTION.

- 1) THE LINE WAS AS LONG AS 200 PEOPLE DEEP AT ITS LONGEST POINT
- 19) EVEN THOUGH WE PUT THE ADDITIONAL 5 MACHINES WE NEVER RECEIVED THE SUPPORTING MACHINES ON THE SUPPORT STAFF TO GET VOTERS TO THOSE ADDITIONAL MACHINES.
- 20) ~~AT~~
- 13) SOME TIMES DURING THE DAY THERE WOULD ONLY BE 2 MACHINES BEING USED BECAUSE A SHORTAGE OF CARS AND WORKERS AND THE SUPPORT MACHINES.
- 14) ~~AT ONE~~ LADY W/ A KID AND AN ABSENTEE BROUT
- 15) OLDER LADY THAT SHOWED UP W/ HER FAMILY AND LEFT 10 MINUTES LATER NEVER TO RETURN
- 16) FRIENDS THAT LEFT & CAME BACK 3 TIMES AND DIDNT VOTE
- 17) ~~NO ONE EVER GOT A PARENTAL BROUT~~
- 18) DEPT OF JUSTICE DUDE AND LADY WITNESS THERE TAKING NOTES ALL DAY LONG.
- 21) I DID SEE PEOPLE COME BACK IN THE EVENINGS THAT HAD LEFT IN THE AM.
- 22) PIZZA, WATER, SNACKS, PIZZA, WATER SNACKS, PIZZA WATER SNACKS. OVER 100 BOXES OF PIZZA SHOWED UP POSSIBLY MORE.
- 23) AT 2PM I CLOSED THE BACK DOOR ON THE REZ CENTER

836 3m

846 2m

917 1m

937 6m

JAMES HARRIS

945 1m

946 1m

JAMES HARRIS CALLED ME BACK

946 7m

959 1m

959 ?

1006 1m

THOMAS WHEATLEY

1007 1m

MARIA SAPOTA

1013 1m

ODETTE YOUSEF

1033 1m

ODETTE YOUSEF CALLED ME BACK

1051 3m

CALLED ME BACK, NOT I THINK

732 1m

JAN TRISBY

735 1m

23) ABOUT 530 ON 6 PM A GUN SHOT UP AND MUSIC.
THAT STUFF WAS OUT SIDE, THERE WERE HOT DOGS AND
BURGERS.

24) IF I HAD TO GUESS ABOUT 10 NEIGHBORS HAD STUCK
AROUND AFTER VOTING TO CHIP IN WHENEVER POSSIBLE
CHANGING OUT TRASH BAGS TAKING OUT THE TRASH
HELPING TO DISTRIBUTE FOOD AND WATER TO PEOPLE

- 23) I ~~PUT~~ ^{PUT} PAPER, WATER AND THE SUPPLIES WOULD SIT ~~UP~~ UP.
- 24) I GAVE WATER AND PIZZA TO THE POLL WORKERS THE NEVER TOOK A BREAK. I DON'T THINK THEY EVEN STOPPED TO EAT FOOD. THEY SAT IN PLACE AND WORKED ALL DAY. THEY WERE INCREDIBLE
- 25) AT ABOUT 7 PM 2 LADIES CAME BY TO ASK HOW MANY PEOPLE HAD VOTED THROUGHOUT THE DAY. IT WAS A # IN THE MID 900'S. IT WAS A SURPRISING # AS WE ALL THOUGHT IT SHOULD BE DOUBLE THAT. AFTER DOING SOME MATH THE #S MADE SENSE 200 PEOPLE IN LINE TAKENS 3 HOURS TO VOTE THAT WOULD BE 800 VOTE IN 12 HOURS AND THE POLLING LOCATION HAD PEOPLE CASTING BALLOTS UNTIL 930 PM. 14 1/2 HOURS.
- 26) AT 7¹⁵ WE GOT WORD THAT A JUDGE HAD SAID WE COULD KEEP THE POLLING PLACE OPEN UNTIL 9 PM BUT THE POLL WORKER WOULDN'T LET US OPEN THE BUILDING BACK UP. A LOT OF PEOPLE WERE MAKING PHONE CALLS AND ARGUING W/ THE POLL LADY IN CHARGE WHICH ALSO HAD THE EFFECT OF HOLDING UP VOTERS. THE POLL WORKER WAS VERY FRUSTRATED
- 27) AT 730 I REALIZED I SHOULD PROBABLY GET IN ^{IN} ^{THE} ^{LINE} BECAUSE THE FEW MAKING PHONE CALLS WERE GETTING NO WHERE. I CALLED JAY TRIPP

THAT ULTIMATELY SHOWED UP ABOUT 745.

FORBES WOOD, MUNICIPAL CLERK, ELECTIONS SUPERINTENDENT 404-330-6031. HE LET US KNOW THAT WE WERE IN A RESTRICTED AREA AND THAT WE SHOULD HAVE REGISTERED TO BE POLL WORKERS.

31) A BAND SHOWED UP AND STARTED PLAYING MUSIC. KIDS WERE RUNNING AROUND AND PLAYING. AT SOME POINTS IN THE DAY YOU COULD FEEL THAT THIS JUST WASN'T RIGHT BUT AT THE SAME TIME THE SENSE OF COMMUNITY WAS STRONG AND IT FELT LIKE WE WERE MAKING HISTORY.

32) 8:01 I POSTED ON FACEBOOK THAT THE DOORS WERE OPEN AGAIN BUT ONLY 5 PEOPLE CAME IN TO VOTE BETWEEN 8 & 9. AT 8 AM I COUNTED 93 PEOPLE IN THE LINE.

33) AT 7:57 PM I POSTED THAT WE NEEDED MORE PENS. THE PENS AT THE POLLING PLACE WERE RUNNING OUT OF INK AND MULTIPLE NEIGHBORS SHOWED UP W/ PENS TO SIDE OUT.

34) AT 9:30 PM THE LAST VOTER VOTED. I WENT TO A NEIGHBORS HOUSE FOR BEER, DRINKS AND TO WATCH THE RESULTS ROLL IN.

8:50 PM 7:30 PM

WOMAN SHOWED UP
W/ ABSENT BALLOT AND DIDN'T
KNOW IF SHE SHOULD
STICK AROUND OR JUST
MAIL IT. HAD A KID
WITH HER.

ADDITIONAL MACHINES
SHOWED UP BUT NO ADDITIONAL
STAFF WAS SENT TO SUPPORT
THOSE MACHINES.

NOT ENOUGH CARS TO SUPPORT
THE ADDITIONAL MACHINES

BECAUSE THE LINE WAS
2, 3, 14 HOUR LONG DEPENDING
ON THE TIME OF DAY
NO ONE WAS ABLE TO
ASK FOR A PROVISIONAL
BALLOT OR ABLE TO ASK
ANY QUESTIONS IN GENERAL

THE POLL WORKERS NEVER GOT A SINGLE BREAK. THEY BARELY HAD TIME TO DRINK WATER OR EAT THE PIZZA THAT WAS GIVEN TO THEM.

THE DOORS WERE LOCKED AT 7 PM EVEN THOUGH ~~IF~~ ~~THEY~~ THERE WAS A COURT ORDER TO KEEP THE DOORS OPEN TILL 9 PM. WE ~~WENT~~ GOT THE DOORS OPEN AT 730 PM.

NEIGHBORS OF ASHLEY DANNY IN THE DAY COUNTED HOW MANY PEOPLE WERE IN LINE BETWEEN THEM AND THE NEXT NEIGHBOR THAT HAD THEIR NAME B, BY THE TIME THEY VOTED THERE WERE ONLY 2 PEOPLE BETWEEN THEM.

THE POLL WORKERS NEVER GOT A SINGLE BREAK. THEY BARELY HAD TIME TO DRINK WATER OR EAT THE PIZZA THAT WAS GIVEN TO THEM.

THE DOORS WERE LOCKED AT 7 PM EVEN THOUGH ~~IT~~ ~~TAK~~ THERE WAS A COURT ORDER TO KEEP THE DOORS OPEN TILL 9 PM. WE BECAUSE GOT THE DOORS OPEN AT 7:10 PM.

NEIGHBORS OF NEARLY EARLY IN THE DAY COUNTED HOW MANY PEOPLE WERE IN LINE BETWEEN THEM AND THE NEW NEIGHBOR THAT KNEW. THERE WERE 13, BY THE TIME THEY VOTED THERE WERE ONLY 2 PEOPLE BETWEEN THEM.

1) Drove by at 7:18 AM, counted 75 cars, 8:28 AM counted 85 cars

- 2) HADNT DONE MY PART, NO DONATIONS ON CANVASING
- 3) Pln AN UMBRELLA FOR THE COMING RAIN, SHOWED UP AT 8:15.
(POSTED TO FACEBOOK @ 8:35 THAT WE WERE STARTING MACHINES)
- 3) MY FRIEND LUCK CAME OUT AT 8:30, LETTING ME KNOW THAT SHE HAD SHOWED UP AT 6:45 AM AND THAT IT ^{ALMOST} TOOK 2 HRS FOR HER TO VOTE

- 4) 8:36 I STARTED MAKING PHONES ~~CALLS~~ 13 PHONE CALLS TO VOTER PROTECTION #1'S AND REPORTING LOCALLY AND ACROSS THE NATION, I MADE PHONE CALLS FROM 836, TO 1051.

- 5) 11:25 AM, 5 MORE VOTING MACHINES SHOWED UP

- 6) JESSIE JACKSON HAD SHOWED UP JUST A BIT EARLIER (10:20 AM) ENCOURAGING PEOPLE TO STAY AND VOTE AND MAKING A TON OF PHONE CALLS HIMSELF

- 7) THE ADRIAN PARK NEIGHBORHOOD STARTED TO RAISE # ON LINE THROUGH FACE BOOK. FOR PIZZA. SOMEONE HAD SHARED THE WEBSITE PIZZA TO THE POLS ON MY PAGE AND I TRIED TO USE IT BUT I WASNT HAVING MUCH LUCK.

- 8) SOMEONE HAD BROUGHT 10 BOXES OF DONUTS ^{(10:38) AM} AND COFFEE FOR THE LINE. THAT STUFF WAS TAKING INSIDE BUT UP TO THE POINT I WAS STAYING OUT SIDE.

- 9) PROBABLY ABOUT NOON PIZZA STARTED TO SHOW UP. JUST 8 BOXES AT FIRST. THERE WAS A REAL CONCERN THAT THERE WOULDNT BE ENOUGH FOR EVERYONE BUT WE FIGURED WE HAD TO GO IN AND START HANDING IT OUT.

- 10) MORE PIZZAS STARTED SHOWING UP.

- 11) I STARTED HEARING STORIES ABOUT HOW LONG THE VOTING WAS TAKING FROM NEIGHBORS. 2, 3, & 4 HOURS TO VOTE